

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual

Civil Action No. 1:24-cv-24228

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

JURY TRIAL DEMANDED

Defendant.

NOTICE OF ISSUES TO BE DISCUSSED AT DISCOVERY HEARING

PLEASE TAKE NOTICE that a hearing on discovery matters will be held before Magistrate Judge Lisette M. Reid on July 14, 2025 at 9:30 a.m. The discovery matters to be heard include:

1. Defendant's failure to respond to Plaintiff's Third Set of Requests for Production, served on April 26, 2025, with responses due on May 27, 2025. Despite multiple good faith attempts to obtain compliance, Defendant has not produced a single document. Plaintiff requests an order compelling immediate production with all objections deemed waived.
2. Defendant's materially deficient discovery responses and concerns regarding spoliation of electronically stored information from Defendant's devices and social media platforms, which require either:

- a. Defendant's immediate provision of login credentials to the previously agreed-upon third-party forensic vendor, FTI Consulting, for follow-up collection from Discord, iMessage, WhatsApp, and Instagram accounts; or
 - b. Adverse inference instructions regarding the uncollected and potentially spoliated communications from these platforms.
3. Plaintiff's request for sanctions pursuant to Federal Rule of Civil Procedure 37 and an award of reasonable attorneys' fees incurred due to Defendant's willful failure to produce responsive documents and refusal to engage in meaningful meet and confer.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(3)

Undersigned counsel conferred with Ms. Cooper via email multiple times to request this status conference, which the Court granted.

Dated: July 11, 2025

Respectfully submitted,

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**

Robert Schwartz (pro hac vice)
Mari F. Henderson (pro hac vice)
Marie Hayrapetian (pro hac vice)
Julian T. Schoen (pro hac vice)
robertschwartz@quinnemanuel.com
marihenderson@quinnemanuel.com
mariehayrapetian@quinnemanuel.com
julianschoen@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000

/s/ Daniel L. Humphrey
Olga Vieira (Fla. Bar No. 29783)
Daniel L. Humphrey (Fla. Bar No. 1024695)
olgavieira@quinnemanuel.com
danielhumphrey@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
2601 S. Bayshore Drive, Suite 1500
Miami, FL 33133
(305) 402-4880

Attorneys for Plaintiff Megan Pete

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on Defendant Cooper via email and a copy will be mailed to her, return receipt requested.

By: /s/ Daniel L. Humphrey
Daniel L. Humphrey
Fla. Bar No. 1024695